REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-33, 35-40, and 47 are pending in this application. Claims 1, 18, and 47 are independent. The remaining claims depend, directly or indirectly, from claims 1, 18, and 47.

Drawings

Applicant respectfully requests the Examiner to acknowledge the drawings filed on January 24, 2000 as formal.

Rejections under 35 U.S.C. § 103

Claims 1-33, 35-40, and 47 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,787,259 ("Haroun"). Independent claims 1, 18, and 47 have been amended in this reply to clarify the present invention recited. Support for these amendments may be found, for example, on pages 7 and 9 of the specification and Figure 4. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The claimed invention relates to a receiver/decoder (*i.e.,* set top box) for communication between an application and an interface, via a device driver. To facilitate this communication, a logical identifier corresponding to at least one feature of the interface is provided to the application. The application uses this logical identifier for directing communication associated with the corresponding feature between the device driver and the application. Thus, the claimed invention provides a method for an application to communicate with an interface, despite the fact that other applications within the receiver/decoder may modify the interface without the knowledge of the application. Further, the invention is entirely *internal* to the receiver/decoder. Specifically, the application, the interface, and the device driver all communicate and operate within a device (*e.g.,* a set top box, etc).

Independent claim 1 of the present invention has been amended to include a limitation reciting that the assignment of the interface identifier associated with a feature of the interface changes *after an event*. Thus, the relationship between the logical identifier and the feature of the interface is independent of that between the interface identifier and the feature, because the interface identifier may change after an event without the knowledge of the application communicating with the device driver. Because the application communicates with the device driver using the logic identifier, the communication between the application and the device driver is not affected by changes to the interface identifier.

Further, claim 1 has been amended to recite that the communication between the application, the device driver, and the interface occurs internally to a device. As shown in Figure 4 of the present invention, the application (4056), device driver, and interface is shown to reside within decoder (2020). Thus, it clear that the present invention relates to the communication between an application and an interface within a device, such as a decoder.

In contrast to the claimed invention, Haroun discloses an entertainment computer (EC (15) in Figure 1 of Haroun) that controls various devices (DVD players, television sets, VCRs, etc.) via an IEEE 1394 bus. Specifically, Haroun discloses an external bus adapter configured to allow a processor, positioned within a housing of a computer, to access consumer electronic devices positioned outside of the computer (see, *e.g.,* Abstract of Haroun). With respect to amended independent claim 1, the Examiner asserts that Haroun discloses interface identifiers that change assignments after an event occurs. The Examiner also asserts that Haroun discloses an internal device driver and references Figure 1 of Haroun in making this assertion. Applicant respectfully disagrees with these assertions.

First, Figure 1 and the accompanying text of Haroun fail to disclose or suggest communication between components *within a device*, as claimed in the present invention. In fact, Figure 1 of Haroun only shows that an entertainment computer communicates with various consumer electronic devices via a bus. It is clear in Figure 1 that the entertainment computer communicates to consumer electronic devices *external* to the entertainment computer. Specifically, the text accompanying Figure 1 describes that the entertainment computer controls the bus and uses commands to control the electronics devices. For example, the entertainment computer may send a command to a receiver that would cause the receiver to increase the gain of

an amplifier in the sounds being produced by speaker s connected to the receiver (see, *e.g.*, col. 4, ll. 24-29). Therefore, it is not possible for Haroun to disclose the type of internal communication claimed in the present invention. Thus, it is clear that Haroun relates to handling *external devices*.

Second, Haroun fails to disclose or suggest that the assignment of the interface identifier to a feature of the interface *changes after an event*. Haroun is completely silent with respect to a change of assignment of an interface identifier based on an event. The Examiner refers to the Abstract and Figure 1 of Haroun in asserting that Haroun discloses this particular limitation of the claimed invention. However, as described above, neither Figure 1 nor any other portion of Haroun shows or describes anything even remotely related to an interface identifier associated with a feature of an interface, or how the interface identifier changes unbeknownst to the application based on some event. In fact, Harouns fails to even mention features of an interface that are used to communicate with an application via a device driver, as claimed in the present invention.

Further, Haroun is completely silent with respect to a device driver that communicates with an application using a *logical identifier* associated with a feature of the interface. Because Haroun does not disclose or suggest an interface identifier subject to changes based on an event, Haroun has no reason or particular advantage in disclosing a separate logical identifier communicated to the application so that the application may still communicate with the interface despite any changes to the interface identifier associated with a feature of the interface.

In view of the above, it is clear that Haroun fails to render amended independent claim 1 of the claimed invention obvious. Dependent claims 2-17 are patentable over Haroun for at least the same reasons. Further, independent claims 18 and 47 have been amended to include similar allowable subject matter (*i.e.*, the limitation reciting an interface identifier that changes after an event, and the limitation reciting that the claimed invention reatles to the internal communication between an application, device driver, and interface within a device). Thus, amended independent claims 18 and 47 are patentable for at least the same reasons as claim 1. Dependent claims 19-33 and 35-40 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345/113001).

Dated: December 15, 2004

Respectfully submitted,

By_____

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